

## **REMARKS**

Claims 1-31 are pending in the application and stand rejected. Claims 1, 14, and 23 have been amended. Applicants respectfully request reconsideration of the claim rejections based on the above amendments and the following remarks.

In the response to arguments set forth on page 2 of the advisory action, Applicants understand that non-obviousness cannot generally be shown by attacking the references individually where the rejections are based on a combination of references. However, to establish a prima facie case of obviousness, the combination of the references must teach or suggest all the claim limitations of the rejected claims (see, e.g., MPEP 2141, 2143, 2143.03). Thus, it is clear if an Examiner relies on a particular reference as disclosing one or more specific elements of the rejected claim, that particular reference can be attacked individually by showing that the reference does not disclose the specific element as contended by the Examiner. Therefore, if at least one of the references in a cited combination of references does not disclose or teach the elements of the rejected claim as cited by an Examiner, then it logically and legally follows that the combination would fail to establish a prima facie case of obviousness against the rejected claim.

### **Claim Rejections- 35 U.S.C. § 103(a)**

Claims 1-31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Singh et al. (U.S. Patent 6,042,687) in view of DeOrnellas et al. (U.S. Patent 6,046,116) and further in view of Yang (U.S. Patent 5,827,437) and Muller et al. (U.S. Patent 5,605,600).

It is respectfully submitted that at the very minimum the combination of Singh, DeOrnellas, Yang, and Muller is legally deficient to establish a prima facie case of obviousness under 35 U.S.C. § 103(a) to support the rejection of claims 1, 14, and 23 because the combination

does not teach or suggest *etching deep trenches in a silicon substrate...wherein the deep trenches have a depth of greater than 8um*, as essentially claimed in claims 1, 14, and 23.

The Examiner acknowledges, on page 4 of the Final Office Action, that neither Singh, DeOrnellas, nor Yang teach a method for etching deep trenches in a substrate that have an etching depth of about 7um or greater.

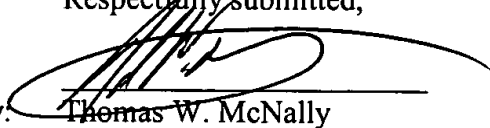
Applicants respectfully submit that Muller does not cure the deficiencies of Singh, DeOrnellas, or Yang because Muller, at the very least, does not disclose or suggest *etching deep trenches in a silicon substrate...wherein the deep trenches have a depth of greater than 8um*.

Therefore, claims 1, 14, and 23 are believed to be patentable and non-obvious over the combination of Singh, DeOrnellas, Yang, and Muller. Further, all pending claims that depend from claims 1, 14, and 23 are believed to be non-obvious and patentable over such combination at least for the reasons given above for respective base claims 1, 14, and 23.

Accordingly, the withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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